DOC ref: DOC22/160326

Emma Barnet
Planning and Assessment Division
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
Email: emma.barnet@planning.nsw.gov.au

15 March 2022

Dear Ms Barnet

Proposed Minto Resource Recovery Facility (Application SSD-5339) at 7 Montore Road, Minto – Response to submissions

Thank you for your request for advice from Public Authority Consultation (PAE-37937981), requesting the review by the NSW Environment Protection Authority (EPA) of the Response to Submissions for the proposed Minto Resource Recovery Facility (Application SSD-5339) at 7 Montore Road, Minto.

The EPA has reviewed the following documents:

- Minto Resource Recovery Facility (SSD-5339) 3 November 2021 – Request for additional information – Nexus Environmental Planning Pty Ltd – 22 February 2022.
- Memorandum – Proposal to construct and operate materials recycling facility at 7 Montore Road, Minto (Site) – Additional Air Quality modelling – RWDI Australia Pty Ltd – 22 February 2021.

I note that the Memorandum reviewed is dated 22 February 2021. This is presumed to be a mistake with the correct date taken to be 22 February 2022.

The EPA has reviewed the response to submissions and determined that the proponent has adequately addressed the issues previously raised by the EPA in correspondence dated 9 November 2021. As such, the EPA can provide recommended conditions of consent regarding air management at the proposed facility. I note that the EPA has previously provided recommended conditions of consent for matters other than air management.

Attachment 1 below provides detailed EPA comments on the response to submissions. Attachment 2 provides the EPAs recommended conditions of consent regarding air management.

If you have any questions about this matter, please contact Greg Frost on (02) 4224 4113.

Yours sincerely

LARA BARRINGTON
Unit Head Regulatory Operations

Attachment 1: EPA comments on additional air modelling

1. Control of emissions from fugitive sources not benchmarked against best practice

The additional information provides clarification on the mitigation measures which include:

- The crushing plant is enclosed
- The crusher and screens are located in a shed
- Storage stockpiles are enclosed in three sided enclosures
- The entry drive is paved with asphalt, with the remainder of the site to be fully sealed with a 5% roller compacted concrete layer
- Dust generation at the processing facility (crushers and screen) to be controlled with the use of water sprays and vacuum dust extraction into a baghouse
- The pugmill is to be fitted with a baghouse to control dust
- A baghouse/dust collector is to be fitted to the cement silo to minimise fugitive dust emissions during silo filling
- The use of a sprinkler system to minimise dust from stockpiles and exposed surfaces

Further, the additional information advises that the modelling did not account for the mitigation measures proposed. Revised modelling has been conducted and is provided in the additional information. Further comments on the revised modelling are provided below.

2. Demonstration that the project will not result in additional exceedances of the impact assessment criteria

The additional information provides revised dispersion modelling to assesses potential impacts. The revised modelling is based on the use of US EPA emission factors for paved surfaces. Previous modelling provided was based on the use of US EPA emission factors for unpaved surfaces. The EPA notes that the proponent proposes to seal the site with a concrete layer, with the exception of the driveway which is to be sealed with asphalt. Additionally, the revised modelling is based on regular sweeping/wet suppression being applied to exposed areas, including vehicle traffic areas. A 50% control factor has been applied to account for this management measure. Emissions from the proposed baghouse sources have also been accounted for in the revised modelling.

For the average day modelling scenario, the assessment does not predict exceedances of the 24-hour average PM_{10} and $PM_{2.5}$ impact assessment criteria at residential or industrial receptors. A slight exceedance of the $PM_{2.5}$ annual average impact criteria is predicted at industrial receiver 2. The EPA notes that background accounts for approximately 90% of the predicted cumulative $PM_{2.5}$ exceedance. As such the incremental contribution from the premises to the additional exceedance is small.

3. Further detail required regarding emissions from baghouses

The additional information provides further explanation and clarification on the proposed baghouses for dust control. In particular, the EPA notes that:

- Dust generation at the processing facility (crushers and screen) is to be controlled with the use of water sprays and vacuum dust extraction into a baghouse
- The pugmill is to be fitted with a baghouse; and

- A baghouse/dust collector is to be fitted to the cement silo to minimise fugitive dust emissions during silo filling

An estimate of the pugmill baghouse discharge concentration is provided in Appendix B of the additional information. An estimate of 10 mg/m^3 is provided which is below the prescribed concentrations in the Clean Air Regulation. The EPA advises that a discharge concentration of 10 mg/m^3 or less could be expected from a baghouse that is designed and operated in a proper and efficient manner. The revised modelling provided in the additional information has accounted for residual dust emissions from the baghouse controls. These emissions account for a small portion of total emission estimates for the premises.

Attachment 2: Recommended conditions of consent

1. The premises must be maintained in such a manner that prevents or minimises the emission of air pollutants from the premises.

2. All operations and activities undertaken at the premises must be carried in such a manner that prevents or minimises the emission of air pollutants, including dust, from the premises.

3. The crushing plant must be enclosed.

4. The processing plant must be fitted with a vacuum dust extraction system and baghouse to capture fugitive emissions from the processing plant, including the crushers, screens, and transfer points.

5. The pugmill must be fitted with a baghouse to capture and control fugitive dust emissions.

6. A baghouse or dust collector must be fitted to the cement silo to prevent or minimise fugitive dust emissions.

7. Stockpiled material must be enclosed on a minimum of three sides, with stockpile heights no greater than the smallest of the three sides.

8. The surface of the site must be sealed with concrete or asphalt to prevent or minimise dust emissions form the premises.

9. Exposed surfaces must be regularly watered or swept to prevent or minimise dust emissions.